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June 15, 2023

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Re: *United States. v. Hernandez*, 15 Cr. 379 (PKC)

Dear Judge Castel:

I write to request an adjournment of the June 29, 2023, CIPA hearing date in this case as I am engaged in trial on the case of *United States v. Trabelsi*, 06 Cr. 89 (RDM) in the District of Columbia; pretrial hearing started in early May and trial started on May 15, 2023. The government has rested; we are now on the defense case. Expert testimony was today, and the defendant is to testify on Tuesday, June 20, 2023.

I have been unable to prepare for the CIPA hearing in this case and regretfully note that I have missed the Court imposed May 26, 2023, deadline for the defense CIPA 5 filing, and must request additional time and an adjournment of the June 29, 2023, hearing date. I respectfully request the Court allow me that right my wrong and consider setting a new CIPA briefing schedule and hearing date. To the extent it will impact the trial date in this case, I very much apologize to all.

The government objects to my request and has instructed me to inform the Court of the following: "the government has advised that it will submit a response to this letter promptly."

Should the Court grant this request, the parties will confer and propose a joint briefing schedule for the Court's consideration.

I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Sabrina Shroff
Counsel to Juan Orlando Hernandez

cc: CISO Rucker & Mullery (via email)